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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Steven Robert Singleton, Samantha Jenkins,  
Nicholle Vannucci, Ellen Brown and  
Deborah Drake, *individuals*; and Homeless  
Action!, *an unincorporated association*,

Plaintiffs,

v.

County of Sonoma, Sonoma County  
Community Development Commission, City  
of Santa Rosa, Does 1 to XX,

Defendants.

Case No.: 3:18-cv-01955-VC

**NOTICE OF MOTION and EX PARTE  
MOTION FOR A TEMPORARY  
RESTRAINING ORDER AND ORDER  
TO SHOW CAUSE WHY A  
PRELIMINARY INJUNCTION SHOULD  
NOT ISSUE**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that on March 30, 2018 Plaintiffs Steven Robert Singleton,

1 Nicholle Vannucci, Ellen Brown, Deborah Drake, Samantha Jenkins and Homeless Action!  
 2 (plaintiffs”) hereby move this court, and seek immediate review pursuant to Rule 65 of the  
 3 Federal Rules of Civil Procedure, of their motion for a temporary restraining order enjoining and  
 4 restraining Defendants Sonoma County, Sonoma County Community Development Commission  
 5 and City of Santa Rosa (“Defendants”), and all persons acting in concert with it or under its  
 6 direction, from:

7 1. Enforcing the Notice to Vacate Illegal Campsite/Lodging on Plaintiffs and all  
 8 others residing in the Roseland Encampments, homeless encampments located at located at 665 to  
 9 883 Sebastopol Road in the City of Santa Rosa issued on March 7, 2018 until such time as the  
 10 Court determines that Defendants have provided sufficient and appropriate shelter placements to  
 11 residents of the Roseland Encampments, including placements that meet the disability-related  
 12 needs of Roseland Encampments residents with disabilities.

13 2. Seizing and disposing of Roseland Encampments residents’ property in violation  
 14 of their Fourth and Fourteenth amendment rights; and

15 3. Citing or arresting individuals at the Roseland site for violation of the Santa Rosa  
 16 City Code Sec. 11-22-.30; California Penal Code Sec. 647(e) and California Penal Code Sec. 602

17 Plaintiffs further move this Court for an order directing Defendants to show cause at a  
 18 time and date why it should not be preliminarily enjoined and restrained as set forth above.

19 This motion is made on the following grounds: (1) Plaintiffs are likely to prevail on the merits of  
 20 the action, or at the least, have raised serious Constitutional questions as to Defendants’  
 21 threatened conduct; (2) in the absence of injunctive relief, Plaintiffs will suffer irreparable injury;  
 22 (3) the balance of hardships tip sharply in Plaintiffs’ favor; and (4) the public interest would be  
 23 served by issuance of the temporary restraining order.

24 This motion is based upon this notice and motion, the Plaintiffs’ Complaint, the  
 25 Memorandum of Points & Authorities in Support of Plaintiffs’ Motion for Temporary Restraining  
 26 Order, the declarations and exhibits submitted in support of the motion, and such other matters as  
 27 the Court may properly consider. Hearing on this motion, if any, shall be at such date and time as  
 28 may be ordered by United States District Court Judge Vince Chhabria, to whom this case is

1 assigned.

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3 Dated: March 30, 2018 CALIFORNIA RURAL LEGAL ASSISTANCE, INC.  
4 PUBLIC INTEREST LAW PROJECT  
5 LAW OFFICE OF ALICIA ROMAN  
6 By: \s\ JEFFERY HOFFMAN  
7 Attorneys for the Plaintiffs

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